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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
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18 JANET SECCO,) CASE NO. 2:20-cv-00426-KJM-CKD
19 Plaintiff,)
20 vs.)
21 THE STANDARD INSURANCE COMPANY)
22 Defendant)
23

24 TO THE HONORABLE COURT:

25 Plaintiff Janet Secco (“Plaintiff”) and Defendant Standard Insurance Company
26 (“Defendant”), by and through their respective counsel of record, hereby agree and stipulate to
27 the following:

WHEREAS, on June 11, 2020, the Court issued minutes from the Video Scheduling Conference setting forth the current Pretrial Schedule for this action;

WHEREAS, the parties have been engaged in informal settlement discussions and seek to avoid having to engage in written and deposition discovery while they continue settlement negotiations;

WHEREAS, due to the January 31, 2021 discovery cutoff, the parties will need to engage in such discovery now if a continuance is not granted;

WHEREAS, the parties seek to continue by 90 days the deadlines in the current scheduling order, which will allow sufficient time to continue informal discussions and proceed to mediation if necessary.

IT IS HEREBY STIPULATED:

The Pretrial Schedule in this matter be continued as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Completion of Fact Discovery	January 31, 2021	April 30, 2021
Expert Disclosures	February 28, 2021	May 28, 2021
Exchange of Rebuttal Expert Witnesses	March 22, 2021	June 21, 2021
Completion of Expert Discovery	April 30, 2021	July 29, 2021
Last day for hearing Dispositive Motions	August 6, 2021	November 5, 2021

IT IS SO STIPULATED.

Dated: October 27, 2020

/s/ Robert J. Rosati (as authorized on 10/27/20)

Robert J. Rosati
Raquel Busani
Attorneys for Plaintiff
JANET SECCO

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1 Dated: October 27, 2020

GORDON REES SCULLY MANSUKHANI, LLP

3 By /s/ Jordan S. Altura

4 Jordan S. Altura

5 Rebecca A. Hull

Attorneys for Defendant

6 STANDARD INSURANCE COMPANY

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8 **ORDER**

9 The Court, having reviewed the foregoing Stipulation, hereby finds good cause to modify
10 the Pretrial Schedule in this action as follows:

<u>Event</u>	<u>Previous Deadline</u>	<u>New Deadline</u>
Completion of Fact Discovery	January 31, 2021	April 30, 2021
Expert Disclosures	February 28, 2021	May 28, 2021
Exchange of Rebuttal Expert Witnesses	March 22, 2021	June 21, 2021
Completion of Expert Discovery	April 30, 2021	July 29, 2021
Last day for hearing Dispositive Motions	August 6, 2021	November 19, 2021

18 IT IS SO ORDERED.

19 DATED: November 3, 2020.

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21 CHIEF UNITED STATES DISTRICT JUDGE

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